

Application No. 09/695,809  
SD-6337 S-92,307

## REMARKS/ARGUMENTS

### Status of Claims

Claims 1 - 12 are currently pending.

### Amendments to the Claims

Applicants have amended the language of claims 1 - 4, and 7 - 12 for clarity. Claim 6 has been canceled.

### Comments on the Previously Filed Response to Office Action

Applicants submitted a response on 08/21/2003, to the Office Action dated 05/21/2003. Applicants desire that the same arguments presented regarding the claim rejections and objections be re-considered in this RCE, in addition to new arguments presented below.

### Joint Inventors

Applicants acknowledge their obligation under 37 CFR 1.56 to point out the inventor and invention dates of each claim that was not commonly owned at the time a later invention was made in order for the examiner to consider the applicability of 35 U.S.C. 103 (c) and potential 35 U.S.C. 102 (e), (f) or (g) prior art under 35 U.S.C. 103 (a). Applicants assert that all the subject matter of the claims in the application was commonly owned at the time any inventions covered therein were made.

### 103 Rejections

In the Final Office Action dated 12/16/2003, the Office repeated the rejections of claims 1, 7 - 9, and 11 under 35 USC 103(a) as being unpatentable over Jouppi (U.S. Patent No. 6,549,215) in view of Kreitman et. al. (U.S. Patent No. 5,956,000).

### Issue #1 The Office has Failed to make a *prima facie* case of Obviousness

In order to make a *prima facie* case of obviousness, the Office must show that the combination of references (Jouppi and Kreitman et. al.) teach all of the elements recited in Applicant's claims.

### Regarding Claim 1:

The combination of Jouppi and Kreitman does not teach a first portion of an image and a second portion of an image, the second portion movable with respect to the first portion. Jouppi (see Figures 8A - 8C) teaches a first portion of an image and at least one second portion of an image, each portion fixed in position with respect to each other on a display. For example, high resolution image (232) is not movable with respect to medium resolution image (236), rather their respective locations on the display are fixed. This is true of all image portions as taught by Jouppi. As pointed out by the Office, Jouppi teaches that (column 5 lines 28 - 42) "... the video information transmitted to the remote user will include the image of the conferee (134) leaving the room...". Thus an image portion may contain video of a subject moving, but it is the subject that is moving within the image portion, not the image portion itself that is movable with respect to another image portion.

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Kreitman does not teach an image transformer for aligning a portion of an image that is moving over another portion of the image. In addition, as taught by Kreitman (column 2 lines 40 – 53) a larger image is made up of a mosaic of sub-images, tiled together and overlapping at the edges of the tiles. Each tile's position is fixed spatially with respect to the images that surround it, with an overlap between the edges of adjacent images. This overlap never changes as the images do not move with respect to each other. An image transformer as taught by Kreitman "...prior to the step of projecting, separately processing each of the N sections at least to compensate for an operator determined amount of misalignment in its corresponding projection unit...", compensates misalignment between two fixed image portions overlapping at their edges, and does not align a second image portion that is moving over a first image portion. Alignment of an image portion that is moving over another image portion is a far more complex issue to solve than the transformation as taught by Kreitman. The definition of an image transformer (a generic term) and the homogenous transformation employed therein necessarily comes from the specification. An image transformer as taught by Kreitman is not capable of the functionality as described by the applicant. That is the image transformer as taught by Kreitman aligns the edges of two fixed images, while the image transformer as disclosed by the applicants maintains continuous alignment of one image portion as it is moved over another image portion.

A combination of the image transformer as taught by Kreitman with the video display system as taught by Jouppi does not contain all the elements of the image display system as claimed by the applicant, that is a system for displaying a first image portion and a second image portion that is movable over the first image portion.

Applicants respectfully submit that Claim 1 as amended is in condition for allowance and the rejection should be withdrawn. Applicants further submit that Claims 8 – 9 and 11 differ from Claim 1 in that Claim 1 is apparatus whereas claims 8 – 9 and 11 are method. Thus the rejection to Claims 8 – 9 and 11 should be withdrawn by the same analysis as above.

Regarding Claims 2 – 7:

As claims 2 – 7 depend from Claim 1, applicants submit claim 1 as amended is in condition for allowance and therefore claims 2 – 7 should be allowed as well.

Regarding Claim 7:

The image transformer and homogenous transform employed in Kreitman's teachings, nor in combination with the teachings of Jouppi, comprises all of the elements of the image transformer and necessary homogenous transformation as defined in the applicants specification. See the argument above but further consider the transform described by Kreitman compensates two adjacent images that do not move with respect to each other. Furthermore, the display system described by Kreitman comprises displays and projectors in a fixed configuration. The image transformer and the homogenous transform defined in the applicants specification compensate an image from a video source with a continuously changing configuration. That is, applicants claim contains means for moving the position of a second image portion with respect to a first portion, such means not taught by Jouppi or Kreitman.

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In the Final Office Action dated 12/16/2003, the Office repeated the rejections of claims 2 – 6 USC 103(a) as being unpatentable over Jouppi in view of Kreitman et. al. and further in view of Washino et al (U.S. Patent 5,625,410).

Issue #2 The Office has failed to provide a teaching, suggestion or motivation to make the combination of Jouppi with Kreitman et. al and Washino.

Regarding Claims 2 – 6:

Washino teaches a video imaging system with cameras having functions of pan and tilt, whose image portions are displayed as adjacent windows (Figures 1 – 6) on a computer monitor. Washino does not teach that those image portions are movable with respect to each other and there is no need for such functionality in Washino's invention. Thus Washino teaches pan and tilt of a camera, to increase a viewable area, not pan and tilt of an image steerer, or projector, to effect movement of one image with respect to another. Pan and tilt of a video source (i.e. a projector) in Washino's invention has no utility. Furthermore, Jouppi and Kreitman describe systems displaying adjacent image portions that are fixed on a display medium, and there is no benefit or motivation to either Jouppi or Kreitman to incorporate pan and tilt capability of a video source in their display systems.

Applicants submit that there is no teaching, suggestion, motivation or utility for combining the pan and tilt functionality of video cameras as taught by Washino with the non-movable images of the systems as taught by Jouppi and Kreitman. Applicants respectfully submit that this rejection should be withdrawn.

In the Final Office Action dated 12/16/2003, the Office objected to Claims 10 and 12 as being dependent upon a rejected base Claim, but would be allowable if rewritten in independent form including all of the limitations of the base Claim and any intervening Claims.

Regarding Claims 10 and 12:

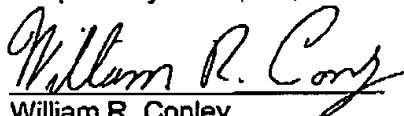
The applicants respectfully submit that Claims 10 and 12 are dependent on Claims that are allowable as amended herein, and the objection should be withdrawn.

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### CONCLUSION

Applicants have responded to each and every objection and rejection, and urge that claims 1 - 5 and 7 - 12 as presented are now in condition for allowance. Applicants request expeditious processing to issuance.

Respectfully submitted,

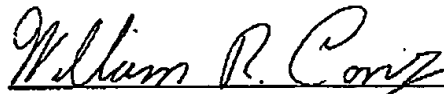


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